



Tarter Krinsky & Drogin LLP  
1350 Broadway  
New York, NY 10018  
P 212.216.8000  
F 212.216.8001  
[www.tarterkrinsky.com](http://www.tarterkrinsky.com)

*Richard C. Schoenstein, Partner*  
212.216.1120  
[rschoenstein@tarterkrinsky.com](mailto:rschoenstein@tarterkrinsky.com)

March 14, 2018

*Via ECF*

Magistrate Judge Steven L. Locke  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

***Re: Capricorn Management Systems, Inc. v. Government Employees  
Insurance Co., 15-cv-02926-DRH-SIL***

Dear Magistrate Judge Locke:

We represent Plaintiff Capricorn Management Systems, Inc. ("Plaintiff") in the above-captioned actopm. Further to the Scheduling Order entered by Your Honor on July 19, 2018, the parties have engaged in substantial fact discovery, exchanging hundreds of thousands of pages of documents and deposing witnesses sought by all of the parties. It appears that fact discovery will conclude by the March 30, 2018 deadline.

The Scheduling Order calls for a Pretrial Conference on June 18, 2018. Given the age of this dispute (filed in 2015), and the age and physical condition of our clients, and pursuant to Federal Rules of Civil Procedure 16(b)(3)(B)(iv) and 16(c)(2)(P), the Plaintiff hereby requests the assignment of a final trial date for this case to commence as promptly after the Pretrial Conference as possible for the Court.

Plaintiff appreciates the Court's attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Richard C. Schoenstein", is written over the typed name.

Richard C. Schoenstein

cc: All Counsel of Record (by ECF)